

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE
IN CHAPTER 13 PROCEEDING
No. 25-11306-TWD

In re:
MELISSA HUELSMAN,

Debtor.

RESPONSE TO DEBTOR'S EX PARTE
MOTION TO SHORTEN TIME ON
DEBTOR'S MOTION TO APPROVE
SALE OF REAL PROPERTY

Jason Wilson-Aguilar, Chapter 13 Trustee, responds to the debtor's Motion to Shorten Time on Debtor's Motion to Approve Sale of Real Property (ECF No. 35):

The debtor's motion seeks approval for the debtor's motion to sell real property (ECF No. 33), filed on July 13, 2025, to be heard on the Court's July 16, 2025 calendar. The Trustee does not necessarily oppose the sale, as the Trustee has not yet had an opportunity to fully review the motion, but raises the following for the Court's consideration:

The debtor seeks to have her motion filed on July 13, 2025 to be heard on July 16, 2025. The Trustee raises, for the Court's consideration, whether two days' notice to the parties is sufficient notice of the debtor's motion. In any proceeding which is to be accorded finality, due process requires notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections. *Mullane v. Central Hanover Bank & Trust Co. et al.*, 339 U.S. 306, 314 (1950).

The Trustee reserves the right to assert additional bases for his response.

WHEREFORE, the Chapter 13 Trustee requests that the Court grant or deny the debtor's motion to shorten time, as the Court deems appropriate.

RESPONSE TO DEBTOR'S EX PARTE
MOTION TO SHORTEN TIME ON
DEBTOR'S MOTION TO APPROVE SALE
OF REAL PROPERTY

Chapter 13 Trustee
600 University St. #1300
Seattle, WA 98101
(206) 624-5124 FAX 624-5282

1 Dated this 14th day of July, 2025

2 /s/ Kristin D. Bowen, WSBA #46688 for

3 Jason Wilson-Aguilar
4 Chapter 13 Trustee
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